

**UNITED STATES BANKRUPTCY COURT FOR THE  
NORTHERN DISTRICT OF OHIO,  
WESTERN DIVISION**

In re:	Case No. <u>13-30346</u>
TMT, INC.	In proceedings under Chapter 11
Debtor	Hon. <u>Mary Ann Whipple</u>
_____ /	

In re:	Case No. <u>13-30347</u>
TMT LEASING, LLC	In proceedings under Chapter 11
Debtor	Hon. <u>Mary Ann Whipple</u>
_____ /	

In re:	Case No. <u>13-30348</u>
TONY MARKS EQUIPMENT, INC.	In proceedings under Chapter 11
Debtor	Hon. <u>Mary Ann Whipple</u>
_____ /	

In re:	Case No. <u>13-30349</u>
TMT AERO, INC.	In proceedings under Chapter 11
Debtor	Hon. <u>Richard L. Speer</u>
_____ /	

**MOTION FOR ADMISSION *PRO HAC VICE* OF  
LEON N. MAYER, HOWARD M. BORIN, BRENDAN G. BEST  
AND JOHN J. STOCKDALE, JR., AS COUNSEL FOR DEBTORS**

Pursuant to Local Bankruptcy Rule 2090-1 (N.D. Ohio) Leon N. Mayer, Howard M. Borin, Brendan G. Best, and John J. Stockdale, Jr. (each an “Applicant” and collectively, the “Applicants”), counsel for TMT, Inc., TMT Leasing, LLC, Tony Marks Equipment, Inc., and

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TMT Aero, Inc. (collectively the “Debtors”), respectfully request that this Court enter an Order granting *pro hac vice* admission and authorize the Applicants to appear and participate as attorneys in the above-captioned cases on behalf of the Debtors and Debtors-In-Possession.<sup>1</sup>

1. The Applicant, Leon N. Mayer, is an attorney at the law firm of Schafer and Weiner, PLLC, 40950 Woodward Avenue, Suite 100, Bloomfield Hills, Michigan 48304 (“S&W”) and is admitted to practice before the United States District Court for the Eastern District of Michigan and the United States Court of Appeals for the Sixth Circuit.

2. The Applicant, Howard M. Borin, is a partner at S&W, and is admitted to practice before the United States District Court for the Northern District of Indiana, the United States District Court for the Southern District of Texas, the United States District Court for the Eastern and Western Districts of Michigan, the United States District Court for North Dakota, and the United States Bars of the Court of Appeals for the 4<sup>th</sup> and 6<sup>th</sup> Circuits.

3. The Applicant, Brendan G. Best, is a partner at S&W, and is admitted to practice before the United States District Court for the Eastern and Western Districts of Michigan, the United States District Court for North Dakota, and the United States Bar of the Court of Appeals for the 6<sup>th</sup> Circuit.

4. The Applicant, John J. Stockdale, Jr., is an attorney at S&W, and is admitted to practice before the U.S. District Courts for the Eastern and Western Districts of Michigan.

5. The Applicants are members in good standing of the State Bar of Michigan, and submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the

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<sup>1</sup> The above captioned Debtors have contemporaneously filed a *First Day Motion for Entry of an Order Directing Joint Administration of the Debtor’s Chapter 11 Cases*.

preparation or course of this action. A copy of each Applicant's certification is attached as Exhibits B, C, D and E respectively.

6. The Applicants request that this Court grant this Motion so that the Applicants may file pleadings and appear and be heard at the hearings in these proceedings.

**WHEREFORE**, Applicants respectfully request entry of an order, substantially in the form of attached Exhibit A, admitting the Applicants *pro hac vice* and granting such other and further relief as the Court deems appropriate.

Respectfully submitted,

SCHAFER AND WEINER, PLLC

/s/Leon N. Mayer

LEON N. MAYER (Michigan Bar No. P54290)

HOWARD M. BORIN (Michigan Bar No. P51959)

BRENDAN G. BEST (Michigan Bar No. P66370)

JOHN J. STOCKDALE, JR. (Michigan Bar No. P71561)

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*Proposed Counsel for Debtors*

*and Debtors-In-Possession*

Dated: February 4, 2013

**Exhibit A**

**UNITED STATES BANKRUPTCY COURT FOR THE  
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**ORDER GRANTING MOTION FOR ADMISSION *PRO HAC VICE* OF  
LEON N. MAYER, HOWARD M. BORIN, BRENDAN G. BEST AND  
JOHN J. STOCKDALE, JR., AS COUNSEL FOR DEBTORS**

Upon consideration of the Motion for Admission *Pro Hac Vice* of Leon N .Mayer,  
Howard M. Borin, Brendan G. Best, and John J. Stockdale, Jr., as Counsel for the Debtors (the  
“Motion”), and good cause having been shown,

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**IT IS HEREBY ORDERED**, that the Motion is granted and Leon N. Mayer, Howard M. Borin, Brendan G. Best, and John J. Stockdale, Jr., are each hereby admitted *pro hac vice* to appear as counsel for Debtors and Debtors-In-Possession, and practice in these proceedings.

**Exhibit B**

**UNITED STATES BANKRUPTCY COURT FOR THE  
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In re:	Case No. <u>13-30347</u>
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In re:	Case No. <u>13-30348</u>
TONY MARKS EQUIPMENT, INC.	In proceedings under Chapter 11
Debtor _____ /	Hon. <u>Mary Ann Whipple</u>

In re:	Case No. <u>13-30349</u>
TMT AERO, INC.	In proceedings under Chapter 11
Debtor _____ /	Hon. <u>Richard L. Speer</u>

**CERTIFICATE OF APPLICANT**

I am eligible for admission to this Court; I am admitted to practice in the jurisdictions specified in the Motion; I am in good standing in such jurisdictions; and I submit to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the Court or in this proceeding.

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Pursuant to 28 U.S.C. § 1746, I declare, under the penalty of perjury, that the above statements are true and correct.

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Leon N. Mayer

**Exhibit C**

**UNITED STATES BANKRUPTCY COURT FOR THE  
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TMT LEASING, LLC	In proceedings under Chapter 11
Debtor _____ /	Hon. <u>Mary Ann Whipple</u>

In re:	Case No. <u>13-30348</u>
TONY MARKS EQUIPMENT, INC.	In proceedings under Chapter 11
Debtor _____ /	Hon. <u>Mary Ann Whipple</u>

In re:	Case No. <u>13-30349</u>
TMT AERO, INC.	In proceedings under Chapter 11
Debtor _____ /	Hon. <u>Richard L. Speer</u>

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Pursuant to 28 U.S.C. § 1746, I declare, under the penalty of perjury, that the above statements are true and correct.

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Howard M. Borin

**Exhibit D**

**UNITED STATES BANKRUPTCY COURT FOR THE  
NORTHERN DISTRICT OF OHIO,  
WESTERN DIVISION**

In re:

Case No. 13-30346

TMT, INC.

In proceedings under  
Chapter 11

Debtor  
\_\_\_\_\_ /

Hon. Mary Ann Whipple

In re:

Case No. 13-30347

TMT LEASING, LLC

In proceedings under  
Chapter 11

Debtor  
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Hon. Mary Ann Whipple

In re:

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TONY MARKS EQUIPMENT, INC.

In proceedings under  
Chapter 11

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\_\_\_\_\_ /

Hon. Mary Ann Whipple

In re:

Case No. 13-30349

TMT AERO, INC.

In proceedings under  
Chapter 11

Debtor  
\_\_\_\_\_ /

Hon. Richard L. Speer

**CERTIFICATE OF APPLICANT**

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Pursuant to 28 U.S.C. § 1746, I declare, under the penalty of perjury, that the above statements are true and correct.

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Brendan G. Best

**Exhibit E**

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In re:	Case No. <u>13-30349</u>
TMT AERO, INC.	In proceedings under Chapter 11
Debtor	Hon. <u>Richard L. Speer</u>
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**CERTIFICATE OF APPLICANT**

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Pursuant to 28 U.S.C. § 1746, I declare, under the penalty of perjury, that the above statements are true and correct.

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John J. Stockdale, Jr.